

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

KATHLEEN SULLIVAN, et al.,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN  
FRANCISCO, et al.,

Defendants.

) Case No.: C06-04686 JSW

) **PLAINTIFFS' MOTION IN LIMINE NO.**  
) **2 TO EXCLUDE OR LIMIT THE**  
) **TESTIMONY OF DEFENSE EXPERT,**  
) **ALEXANDER JASON**

) Trial Date: December 2, 2013

) Trial: 8:00 a.m.

) Pretrial Conf.: April 1, 2013

) Time: 2:00 p.m.

) Courtroom 11, 19<sup>th</sup> Floor

) The Honorable Jeffrey S. White

# EXHIBIT 1



Russell, David  
Sarmiento, John Edward  
Schank, Jarrett Edward  
Sullivan, Sangh (DVD)  
Vignati, Colleen  
Vignati, Gina  
Wynn, Margarita

Deposition transcripts of

Lisa Carella  
Colleen Vignati  
Jason Ramone Martin  
Gina Vignati  
Margarita Wynn  
Sgt. Tracy McCray  
Insp, Ronan Shouldice  
Darren Choy  
Erik Leung  
Sgt. Darren Choy  
Kathleen Espinosa  
Sangh Sullivan  
Nicole Guerra  
Sgt. Jeremiah Morgan  
Officer Michelle Alvis  
David Russell  
Officer Paulo Morgado  
Officer John Keesor

SFPD CAD audio and a print-out

Photographs of evidence

Martin, Jason 6/9/06 interview by plaintiff's investigator Ralph Hernandez

Keesor, John R. 1/29/07 OCC interview  
Keesor, John R. 6/12/06 MCD interview  
Keesor, John R. 4/30/07 MCD interview  
Alvis, Michelle R. 1/25/07 OCC interview  
Alvis, Michelle R. 6/12/06 MCD interview  
Alvis, Michelle R. 4/26/07 MCD interview  
Morgado, Paulo M. 1/24/07 OCC interview  
Morgado, Paulo M. 6/12/06 MCD interview  
Oshita, Yukio 1/11/07 OCC interview  
Oshita, Yukio 6/12/06 MCD interview  
Leung, Erik 7/5/06 MCD interview  
Leung, Erik 1/11/07 OCC interview



## Analysis

In preparation for this shooting incident analysis, in addition to reviewing the above documents and other items; I also visited the shooting scene twice and spent several hours in the attic taking measurements and photographs. During one of my examinations, I setup a demonstration with the actual SFPD officers who had been involved in the incident (Alvis, Keesor, Morgada, & Oshita). These officers wore the same clothing and utilized the same flashlights as they did during the shooting incident. The officers assumed their locations and I was able to substantially replicate the scene and to take photographs using an additional person similar in size to the decedent.

The photographs used for the demonstration were taken from each officer's location and represents the view each officer had of the decedent and the decedent's location. The lighting conditions, utilizing their flashlights, was substantially similar to the conditions existing before and during the shooting incident.<sup>1</sup>

I personally examined some of the evidence items: The decedent's T-shirts, pants, hat, glasses, watch, and eyeglass case.

I have prepared a three dimensional computer model of the shooting location which I have used for analytical purposes and I also intend to produce graphic exhibits for courtroom use.

## Findings

- The location of the decedent as shown in the SFPD scene photos and diagrams and the location of the Officers Keesor and Alvis as described and demonstrated, are consistent with the physical evidence.

Basis: The decedent's location, as shown in the SFPD scene photos, was in the Southeast corner of the attic. Officer Keesor described and demonstrated his location as being directly South of the decedent on the West side near the entry hatch. Officer Alvis described and demonstrated her location as on the East side of the attic midline near the large air duct.

In addition to being consistent with the decedent's gunshot wounds, the described and demonstrated locations are also consistent with the bullet trajectories indicated in the perforations of numerous joists, air ducts, and other structural members.

There are numerous wood particles visible on the decedent's pants, shirt, face, and hair consistent with him being shot while in that location because several



bullets perforated wood members and would have projected wood fragments towards the decedent.

There are apparent blood spatter deposits with an elliptical shape on the upper joist on the decedent's right side. These spatters are consistent with an origin above – where the decedent's head would be if he were sitting erect.

The soles of the decedent's shoes have apparent retained insulation material consistent with walking in the attic.

- The physical evidence is consistent with the decedent's right arm being outstretched as if aiming a gun with his arm in front of his chest and below his chin when the head was struck by one of more bullets.

Basis: The right arm is visible in the SFPD scene photos on the right side of two floor joists; the decedent's head is above on the left side of the upper joist. There is a pattern of bloodspatter on the inside of the decedent's right forearm. This pattern includes elongated spatters on and near the antecubital fossa. The blood origin indicated by these spatters is not consistent with blood projected from above. The spatters are consistent with a projection of blood from the face wound (thru the eyes) which would have caused a projection of small blood droplets which would have struck the inner forearm if the arm was held up essentially parallel to the floor.

- The location of the black eyeglass case is consistent with the decedent having held it in his right hand.

Basis: The eyeglass case was described as being recovered from beneath the decedent's right arm.

- The physical evidence is consistent with the eyeglass case having been in proximity to a gunshot wound and specifically consistent with the case being held up and in front of the decedent as if he were using it to simulate a handgun.

Basis: My examination of the case showed that it had blood deposits of a size and shape consistent with having been produced by a gunshot wound.

- The decedent's torso and head were, for some period of time after being shot, in a more erect position than shown in the SFPD scene photos.

Basis: This is supported by the blood flow patterns on the decedent's head which indicate that the head was more upright than shown in the photos for sometime after being shot.



- The left arm has 5 entrance gunshot wounds, none higher than the elbow area. The locations of these wounds are consistent with the left arm being raised to a level higher than the adjacent joists (on the left).

Basis: There is only one perforation of the adjacent (left) joist which could align with one of the arm wounds but there are still four others that would require the arm to be above the level of the upper floor joist.

- The decedent's left arm was in contact with his head or face at some point during or after the shooting.

Basis: The blood deposit on the decedent's left arm is consistent with contact transfer from another bloody object or surface. There is apparent blood transfer on the left side of the decedent's head behind his ear which is consistent with contact with his arm.

- The bullet that caused wound "N" in the left forearm ("N") first struck and perforated a wooden member before contacting the decedent.

Basis: The entry defect has a large circumferential abrasion margin and the size is not typical of a primary bullet impact. This defect is also surrounded by small satellite defects consistent wood fragments that would accompany a bullet after perforating a wood object.

- The physical evidence is consistent with Officer Alvis' perception of apparent muzzle flashes from the decedent's location.

Basis: When firing a handgun in a dark environment, each gunshot will produce a short duration flash of light (muzzle flash) which will very briefly (less than a 10<sup>th</sup> of a second) project visible light, predominately in a forward direction.

Officers Keesor and Alvis both describe the decedent as wearing eyeglasses while in the attic. A pair of metal-rimmed glasses are seen in the decedent's lap in the scene photos and this item was recovered. Both the glass lenses and the shiny metal frame of the glasses will reflect light. Additionally, the decedent was described as holding a wristwatch in his left hand. A watch was also recovered nearby and is in evidence. This watch has a shiny metal wristband and an highly reflective clockface which would readily reflect light.

The watch and the eyeglasses will reflect light and both objects could have reflected light from any of the flashlights being used and/or by Officer Keesor's or Officer Alvis' muzzle flashes which could be perceived as primary muzzle flashes.

The eyeglass case has a highly reflective metal hinge. If the case was brought up into the beam of a flashlight, it could reflect the light outward giving the



appearance of a muzzle flash – particularly when accompanied by a loud sound.

- The physical evidence is consistent with Officer Alvis' firing while or after falling onto the attic floor.

Basis: There are is a bullet perforations of the large air duct and of a wood cross member that indicating the shots being fired from a very low height from the attic floor which is consistent with Officer Alvis firing while or after falling.

- The injury sustained by Officer Alvis is consistent with having been caused by a ricocheting bullet fragment or other small object.

Basis: The medical documentation of Officer Alvis' wound on her left ear describes it as an "abrasion" with swelling and some internal bleeding. In this incident 26 rounds were fired with several striking wood beams and metal ducts and other objects. It is possible that a fragment from one of the bullets or one of the objects struck was propelled toward Officer Alvis, striking her ear.

- The total time interval for all 26 shots could have been less than 3 seconds in duration.

Basis: While the actual time interval for all 26 shots to be fired is unknown, rapid, urgent firing can readily achieve a firing rate of 4-5 RPS. This indicates that if both shooters were firing simultaneously, the time interval could be 2.5 to 3 seconds.

- Officer Keesor had the only viewing location which allowed a view of the decedent's right hand when raised above the floor joists.

Basis: Neither Officer Keesor nor Officer Alvis had an unobstructed full view of the decedent's torso, legs, arms, and hands before the shots were fired or while the shots were fired. The presence of the many joists, rafters, air ducts, vent pipes, and cross brace support elements prevented the officers from seeing the decedent completely.

Officer Alvis, while closer to the decedent than Officer Keesor, had a more restricted view because she was standing behind a large air duct with several vertical support beams and cross brace elements between her location and the decedent.

Keesor had a direct view of the decedent's head, upper torso, and upper left arm but only when the decedent sat up with torso erect. Keesor's view of the visible portions of the decedent's body was enhanced by the light wood background on the "wall" to the decedent's right. While Keesor's view of the

decedent's left forearm and hand was only possible when the decedent placed his left arm above or over the adjacent joists.

Officer Oshita's view was very limited by the trusses. He could only see a portion of the decedent's upper torso but only when the decedent leaned or moved back sufficiently to place himself in view.

Officer Morgado's view was also restricted by the intervening trusses. At some times – depending on the position of his head and the decedent's body position – Officer Morgado was only able to see the decedent's head and not the torso nor the arms and hands – unless they were raised to the level of his face.

☒ The eyeglass case can produce a loud sound which could be reasonably interpreted as a gunshot.

Basis: When snapped shut with speed, the rigid eyeglass case will produce a loud acoustic report. This can be described as a popping sound and could be perceived as the sound of a gunshot in an enclosed area.

Exhibits:

- Photographs of the scene.
- Photographs of SFPD Officers.
- Photographs of evidence items.
- 3D Computer Model Renderings.

The above items are contained in the CD attached to this report.

Sincerely yours,



Alexander Jason, SCSA, CFPH  
Certified Senior Crime Scene Analyst



## **Alexander Jason**

### **Certified Senior Crime Scene Analyst**

*Crime Scene Analysis / Forensic Photography*

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#### **Cases in which I testified and/or was deposed for the past 5 years: (as of October, 2007)**

Darcy Ann Gray, et al vs Chad Cradeur, et al; U.S.D.C., Western District; April 2000.  
Tang vs City of Westminster, et al. USDC; SA CV 99-358 GLT (EEEx), June, 2001  
State of Washington vs. R. J. Stoner; Superior Court, Jefferson County, August, 2001  
Missouri vs. Werner; Circuit Court of Cass County, CR300-1152FX, November, 2001  
USA vs Macias; US District Court, Southern District; 02-20179-Cr-Seitz, May, 2004  
State of Texas vs Mikel; 125<sup>th</sup> District Court, October, 2004  
Adams vs. Speers, et al; US District Court CIV-F-02-5741 REC LJO, October, 2004  
People vs Solis, Superior Court, Napa, CA, February, 2005  
U.S.A. vs Stanley, General Court Martial, Ft. Riley, KS, June, 2005  
Viera v. City of El Monte, et al, USDC; SA CV, February, 2006  
Stansfield v. City of El Cajon, Federal Court, San Diego, CA, July 2006  
State of Florida v. Justin Barber, State Court, Jacksonville, FL, June 2006  
Zapatella v. Toyobo & Second Chance Inc, Superior Court, San Diego, CA, August, 2006  
McDermott v. City of Fremont, Federal Court, San Francisco, CA January, 2007  
People v. Zupan, Superior Court, Nevada City, CA, March 2007  
United States v. Kenneth P. Wilk, Case No. 04-60216-CR-COHN/SNOW  
Ft Lauderdale, FL, May 2007  
Boyd v. CCSF, U.S. District Court No. C04-5459, May 2007  
Gonzalez, et al. v. City of Garden Grove, et al. USDC CV05-1506 CAS(MCx)  
Rios v. County of San Bernardino, et al, Case No. :CV06-00569 VAP (JTLx), October, 2007  
Brown v. City of El Cajon, et al, October, 2007, GIC 868862, County of San Diego  
Sate of Texas v. Rhode, Homicide, Superior Court, Brownsville, TX, 2007  
Galvan v. Yates, et al, USDC No. 1:05-CV-00986-LJO-NEW (WMW), Modesto, CA 2008  
State of New York v. Oliver, et al; NYPD Officers, Queens Supreme Court, Queens, NY. 2008



# **Alexander Jason**

## **Certified Senior Crime Scene Analyst**

### **Shooting Incident Reconstruction / Forensic Photography**

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## **CURRICULUM VITAE**

**Certified Senior Crime Scene Analyst:** Board Certified by the *International Association for Identification (IAI)*; the oldest professional forensic science organization.

**Board Certified in Forensic Photography and Digital Imaging** by the IAI

**Qualified Expert Witness:** in Crime Scene Reconstruction, Forensic Photography, Shooting Incident Reconstruction, Wound Ballistics, Bloodspatter Interpretation and Forensic Computer Animation in Federal and State Courts (Alaska, California, Colorado, Florida, Maryland, Missouri, New Jersey, Texas, Washington, and West Virginia.)

## **PROFESSIONAL DESCRIPTION & EXPERIENCE**

The focus of my professional work is crime scene analysis, shooting incident reconstruction, and forensic photography. My primary interest is in the reconstruction of shooting incidents, the human and mechanical dynamics of shooting and the science of wound ballistics which relates to the use of firearms against humans and specifically to the interaction of projectiles and the human body. I also specialize in the creation and production of Forensic Computer Animation used as demonstrative exhibits.

## **PROFESSIONAL MEMBERSHIPS**

**Fellow** of the American Academy of Forensic Sciences  
**Co-Founder:** International Wound Ballistics Association  
**Member:** International Homicide Investigators Association  
**Member:** International Association of Bloodstain Pattern Analysts  
**Member:** International Association for Identification  
**Technical Advisor:** Association of Firearm and Toolmark Examiners  
**Member:** Evidence Photographers International Council

## **CURRENT & PRIOR PROFESSIONAL EXPERIENCE**

**Past President, Fellow, & Distinguished Member:** Association for Crime Scene Reconstruction

**Shooting Reconstruction Instructor:** Selected by the U.S. State Department to teach a 3 day course on "Forensic Ballistics" to members of the PGR (Attorney General of Mexico's Investigative and Crime Scene personnel – equivalent to our FBI) at the PGR Academy in Mexico City, Mexico (October, 2000).

**Digital Forensic Photography Instructor:** Primary producer and instructor of comprehensive seminar for law enforcement, medical, and forensic personnel teaching basic and advanced concepts and methods of forensic photography.



**U.S. Congress' Office of Technology Assessment Advisory Panel (1990-1992):** Appointment to study and evaluate the effects of police officers being shot and to develop ballistic impact and penetration standards for police body armor.

**Managing Editor of the *Wound Ballistics Review: The Journal of the International Wound Ballistics Association*; 1990-1995.** (Most IWBA Full Members are physicians; many others are engineers, scientists, and law enforcement members engaged in the study of wound ballistics.)

**Consultant on Shooting Incidents, Firearms and Ballistics** to the United States Army, federal agencies, major corporations, law enforcement agencies as well as to the "CSI" & "CSI Miami," "Law & Order" TV shows, NBC, CBS, ABC, PBS/NOVA and several major film studios. I have also consulted on bullet design and performance parameters for ammunition manufacturers. I have appeared numerous times on CNN, Fox News, MSNBC and other news shows while interviewed on current shooting incidents.

**Forensic Animation Consultant** to the Autodesk Corporation (a major engineering and animation software producer.) I am the creator of the first 3D computer animation accepted (over objection) in a murder trial (People v. Mitchell, Marin Co., CA 1992) and the first animation accepted in a U.S. criminal court based on the testimony of a defendant: (People v. Hood, San Bernardino, CA 1992).

**Co-Instructor:** Shooting Reconstruction: Ballistic Trajectory Analysis Class (3 days); for the State of California Department of Justice, California Criminalistics Institute, February, 1996.

**Consultant** on Crime Scene Reconstruction for CBS News (OJ Simpson case)

**Writer, Producer, & Director** of six instructional video programs on firearms, wound ballistics, the use of deadly force by civilians, and forensic firearms evidence:

*Deadly Weapons: Firearms & Firepower* (1 hour and 45 minutes);  
*Deadly Effects: Wound Ballistics* (1 hour and twenty minutes);  
*Deadly Force: Firearms, Self Defense, & The Law* (1 hour and 40 minutes);  
*Forensic Firearms Evidence: Elements of Shooting Incident Investigation* (3 hours)  
*Gunshot Wounds: Examination, Interpretation, Documentation* (Producer)  
*Blunt Force, Sharp Force, Pattern Injury: Examination, Interpretation, (Producer)*

*All the above video programs are utilized for training by law enforcement agencies (including the FBI), crime labs, universities, medical schools, and many other institutions throughout the world.*

**Recipient** of the American Film Institute's 1990 AVC Award for "Best Instructional Video" for *Deadly Force: Firearms, Self Defense, & The Law*.

**Editor** of the *Forensic Firearms Evidence: Elements of Shooting Incident Investigation* handbook and the co-author of a forensic firearms evidence written examination both of which are used by law enforcement agencies and crime laboratories in the U.S. and many other countries.



**WORK HISTORY**

San Francisco Police Department 1970-74;

Principle duty was as a detective / investigator .

Second Chance Body Armor, Inc., Executive Vice President, 1975-1976;

Supervised research, development, and testing of body armor for law enforcement.

Research West, Inc. 1976 -1978;

Senior Analyst performing research, analysis, and supervising investigations.

Self-employed 1978 - present; Shooting Incident Reconstruction / Crime Scene Analyst

**EDUCATION & TRAINING**

**U.S.. Army Artillery & Missile Command School of Communication Electronics (1967)**

Comprehensive training in Physics and Electronic theory.

**School of Communication Electronics, San Francisco, CA, (1969)**

Advanced Mathematics and Physics.

**San Francisco Police Academy, 1971**

Basic Peace Officer Training: Firearms, Criminal Law, Crime Scene Investigation, etc.

**San Francisco State University, B.A., Journalism, 1973. (Honor graduate *Cum Laude*)**

**Ferdinand University Graduate School of Management, 1975 (Non-Degree)**

Completed Master's program in Operations Research and Management. Operations

Research involves constructing mathematical and statistical models to describe complex mechanical and human operations.)

**Letterman Army Institute of Research**

Informally studied and performed research for three years at the U.S. Army's Wound Ballistics

Laboratory which was an internationally recognized wound ballistics research facility (1987-90.)

**Gunshot Wounds & Blunt and Sharp Force Injuries**

Dr. Patrick Besant-Matthews, MD, Forensic Pathologist. 1992, 1993, 1994, 1996, 1997, 1999.

**Pathology of Gunshot Wounds**

Extensive Private Instruction, 1993-2000 with Dr. P.E. Besant-Matthews, MD; (Board Certified Forensic, Anatomic, & Clinical Pathologist)

**Association of Firearm & Toolmark Examiners**

Seminars on Firearms Examination & Identification, Toolmark Ballistics, and Criminalistics, 1990, 1992, 1993, 1994, 1995, 2001, 2003.

International Assoc for Identification Training Seminar on Crime Scene Investigation, Sep, 1993, 2002

American Academy of Forensic Science Annual Conferences, 1994-2000

Association of Crime Scene Reconstruction Training Conferences, 1995-2002

Shooting Incident Reconstruction Seminar,

AFTE Conference, San Diego, CA 1995

International Bloodstain Pattern Analysts & Association for Crime Scene Reconstruction

Joint Training Conference, Oklahoma City, OK 1995.

Shooting Reconstruction: Ballistic Trajectory Analysis



California Department of Justice, California Criminalistics Institute., February, 1996.

**Laboratory of Forensic Science**

Institute on the Physical Significance of Bloodstain Evidence; May, 1996.

**Institute of Forensic Medicine**

National Seminar on Forensic Medicine, Panama Dept of Justice, Panama, July 1996.

**Scientific Assembly of Forensic Nurses**

Kansas City, KS: Nov., 1996

**International Bloodstain Pattern Analysts & Association for Crime Scene Reconstruction**

Joint Training Conference, Albuquerque, NM, Nov, 1996.

**California State University, Long Beach**

Advanced Field Evidence Technician Seminar, Anaheim, CA, Nov 1996

**FIREARMS EXPERIENCE**

Formally National Rated Competitive Shooter; U.S. Army "Expert" rating in Rifle and Pistol. SFPD Academy Combat Pistol and Shotgun Training. Served for 14 years as Rangemaster at one of the major law enforcement shooting competitions. Duties included design of shooting courses and events, evaluating marksmanship skills and proficiency with handguns, rifles, and/or shotguns. I also provided marksmanship and firearm safety instruction.

**CERTIFICATIONS, MEMBERSHIPS, & LICENSES**

California Department of Justice Certified Firearms Instructor

California Private Investigator's License

California Concealed Weapons Carry Permit

Certified Rifle, Pistol, & Shotgun Instructor

Certified Home Self Defense Instructor

Member: MENSA (restricted to those with an IQ in the 98th percentile.)

**PERSONAL / LANGUAGES**

U.S. Citizen, DOB: 21 April 1947; Married, one child

Spanish: read, write, & speak fluently German: basic conversational



## Presentations

Phoenix Law Enforcement Association  
*Wound Ballistics*

Phoenix, AZ; February, 1989

## The National Judicial College

*Demonstrative Evidence: Forensic Computer Animation*  
Reno, NV; December, 1992Assoc of Firearm & Toolmark Examiners Training Seminar  
*Forensic Animation: Shooting Incident Reconstruction*

Miami, FL; April, 1992

## San Francisco Barrister's Club

*Demonstrative Evidence: Forensic Animation*  
San Francisco, CA; August, 1992

## Detroit Police Department /

American Society for Industrial Security  
*Shooting Incident Reconstructions & Computer Animation*  
Detroit, MI; March, 1993

## California Association of Criminalists

*Forensic Animation for Criminal and Civil Trials*  
Berkeley, CA; March, 1993

## Assoc of Firearm &amp; Toolmark Examiners Training Seminar

*Forensic Computer Animation*  
Raleigh, NC; May, 1993

## Tulare County Trial Lawyers Association

*Forensic Animation: Shooting Incident Reconstruction*  
Visalia, CA; September, 1993

## International Association for Identification

*Shooting Incident Reconstruction with Computer Animation*  
Caspar, WY; September, 1993

## American Academy of Forensic Sciences

*Forensic Animation & Shooting Incident Reconstruction*  
San Antonio, TX; February, 1994

## California Public Defender's Association

*Computer Animation in the Courtroom*  
Long Beach, CA; February, 1994

## International Wound Ballistics Association

*Shooting Incident Reconstruction & Computer Animation*  
Sacramento, CA; March, 1994

## International Wound Ballistics Association

*A Method for Determining Graze Wound Direction*  
Sacramento, CA; March, 1994

## California District Attorney's Association

*Animation and Graphics: Bringing Your Case to Life*  
San Rafael, CA; April, 1994

## Northwest Association of Forensic Scientists

*Forensic Animation & Shooting Incident Reconstruction*  
Concord, CA; April, 1994

## National College of District Attorneys

*Showing the Shooting: Developments in Forensic Ballistics*  
South Lake Tahoe, CA; April, 1994

## Assoc of Firearm &amp; Toolmark Examiners Training Seminar

*Computer Animation and Shooting Reconstruction*  
Indianapolis, IN; June, 1994

## High Technology Crime Investigators Association

*Using Computers for Shooting Reconstruction*  
Monterey, CA; June, 1994

## Assoc for Crime Scene Reconstruction Training Conference

*Computer Animation for Crime Scene Reconstruction*  
Oklahoma City, OK; September, 1994

## American Academy of Forensic Sciences

General Section

*The Virtual Crime Scene*

Seattle, WA; February, 1995

## American Academy of Forensic Sciences

Criminalistics Section

*Forensic Computer Animation**Use in the Illustration of Shooting Incidents*  
Seattle, WA; February, 1995

## Hastings Law School

Trial Advocacy Seminar

*Computer Animation as Demonstrative Evidence*  
San Francisco, CA; March, 1995

## American Inn of Court

*Crime Scene Reconstruction & Computer Animation*  
San Francisco, CA; May, 1995

## Assoc of Firearm &amp; Toolmark Examiners Training Seminar

*Computer Animation and Shooting Reconstruction*  
San Diego, CA; June, 1995

## American Inn of Court

*Forensic Computer Animation: Uses & Abuses*

Lake Charles, LA; September, 1995

International Bloodstain Pattern Analysts & Association of Crime  
Scene Reconstruction Joint Training Conference*Shooting Incident Reconstruction*  
Oklahoma City, OK; October, 1995

## American Inn of Court

*Forensic Computer Animation*University of San Francisco Law School San Francisco, CA; October,  
1995

## American Academy of Forensic Sciences

Computer Animation:

*It's Use in Crime Scene Reconstruction*

Nashville, TN; February, 1996

National Seminar on Forensic Medicine Panama Dept of Justice /  
Intl Criminal Investigative Training & Assistance Program

(U.S. Dept. of Justice)

*Shooting Incident Reconstruction / Wound Ballistics*

Institute of Forensic Medicine,

Panama Dept of Justice, Panama City; July 1996



<p><b>Presentations</b></p> <p><b>Defense Investigator's Association</b> <i>Shooting Incident Reconstruction</i> Oakland, CA; October, 1996</p> <p><b>Scientific Assembly of Forensic Nurses</b> <i>Crime Scene Reconstruction</i> Kansas City, MO; November, 1996</p> <p><b>Association for Crime Scene Reconstruction / Int'l Association of Bloodstain Pattern Analysts</b> <i>Shooting Incident Reconstruction</i> Albuquerque, NM; November, 1996</p> <p><b>American Academy of Forensic Sciences</b> Criminalistics Section <i>Blood on the Bullet</i> <i>The Detection of Blood on Fired Bullets</i> New York, NY; February, 1997</p> <p><b>American Academy of Forensic Sciences</b> <i>Crime Scene Reconstruction: Applying Computer Technology</i> New York, NY; February, 1997</p> <p><b>Association for Crime Scene Reconstruction / Int'l Assoc of Bloodstain Pattern Analysts Joint Training Conference</b> <i>Reconstruction of Shooting Incidents</i> Seattle, WA; November, 1997</p> <p><b>Association for Crime Scene Reconstruction / Int'l Assoc of Bloodstain Pattern Analysts Joint Training Conference</b> <i>Workshop: Shooting Incident Reconstruction</i> Seattle, WA; November, 1997</p> <p><b>American Association of Law Schools Section on Evidence</b> <i>Crime Scene Reconstruction &amp; Computer Animation</i> San Francisco, CA; January, 1998</p> <p><b>American Academy of Forensic Sciences</b> Criminalistics Section <i>Blood on the Bullet</i> <i>The Detection of Blood on Fired Bullets, Part II</i> San Francisco, 1998</p> <p><b>University of California, Hastings College of The Law</b> <i>Advanced Evidence Seminar / Prof. Roger Park</i> San Francisco, CA; April, 1998</p> <p><b>Utah Assoc of Crime Scene Analysts Principal Instructor</b> <i>Shooting Incident Reconstruction Training Class</i> (2 days) Ogden, UT; June, 1998</p> <p><b>Association for Crime Scene Reconstruction</b> <i>Workshop: Shooting Incident Reconstruction on Vehicles</i> Oklahoma City, OK; November, 1998</p> <p><b>Association for Crime Scene Reconstruction</b> <i>"He Didn't Fall for Her" - A Shooting Reconstruction</i> Oklahoma City, OK; November, 1998, CA, 1998</p>	<p><b>American Academy of Forensic Sciences General Section</b> <i>Shooting Incident Reconstruction</i> Orlando, FL, 1999</p> <p><b>University of California, Hastings College of The Law</b> <i>Forensic Computer Animation: Admission and Use</i> San Francisco, CA; April, 1999</p> <p><b>Richmond Police Department Evidence Technicians</b> <i>Shooting Incident Reconstruction Techniques</i> Richmond, CA; May, 1999</p> <p><b>Association for Crime Scene Reconstruction</b> <i>Shooting Reconstruction:</i> <i>16 Bullets, One Dresser, One Decedent</i> Kansas City, MO, Sept; 1999</p> <p><b>Association for Crime Scene Reconstruction</b> <i>Shooting Reconstruction Workshop (Instructor)</i> Kansas City, MO, Sept; 1999</p> <p><b>American Academy of Forensic Sciences</b> <i>The Gallardo Case: A Shooting Reconstruction</i> Reno, NV; February, 2000</p> <p><b>University of California Hastings School of Law</b> <i>Advanced Evidence Seminar / Prof. Roger Parks</i> San Francisco, CA; April, 2000</p> <p><b>National Defense Investigators Association</b> <i>Crime Scene Reconstruction</i> Las Vegas, NV; Oct, 2000</p> <p><b>Procuraduria General de la Republica</b> <b>(Office of the Attorney General of Mexico)</b> <i>Forensic Ballistics Course (3 Days)</i> Mexico City, Mexico, Oct 2000</p> <p><b>American Academy of Forensic Sciences</b> <i>The Effect of Hair Upon the Deposition of Gunshot Residue</i> Seattle, WA, Feb 2001</p> <p><b>University of California Hastings School of Law</b> <i>Guest Speaker Advanced Evidence Seminar / Prof. Roger Park</i> San Francisco, CA; April, 2001</p> <p><b>California Judges Association</b> <i>Guest Speaker: Digital Evidence Seminar</i> Palm Springs, CA, May, 2001</p> <p><b>Association of Firearm &amp; Toolmark Examiners</b> <i>Shooting Reconstruction: Putting It Together</i> Newport Beach, CA, July, 2001</p> <p><b>Association of Firearm &amp; Toolmark Examiners</b> <i>The Effect of Hair Upon the Deposition of Gunshot Residue</i> Newport Beach, CA, July, 2001</p>
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<b>Presentations</b>
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**Association for Crime Scene Reconstruction**  
*The Effect of Hair Upon the Deposition of Gunshot Residue*  
 Las Vegas, NV, October, 2001

**Santa Clara University Law School**  
*Guest Speaker*  
 Advanced Evidence Seminar / Prof. Kandis Scott, Santa Clara, CA,  
 February, 2002

**University of California Hastings School of Law**  
*Guest Speaker Advanced Evidence Seminar / Prof. Roger Park*  
 San Francisco, CA; April, 2002

**International Association for Identification**  
*Homicide or Suicide: The Cameron Reconstruction*  
 Las Vegas, NV; March, 2002

**Association for Crime Scene Reconstruction**  
*The Penetration of Automotive Windshields by .223 Ammunition*  
 Denver, CO, October, 2002

**Santa Clara University Law School**  
*Guest Speaker*  
 Advanced Evidence Seminar / Prof. Kandis Scott Santa Clara, CA,  
 March, 2003

**Association of Firearm & Toolmark Examiners**  
*The Penetration of Automotive Windshields by .223 Ammunition*  
 Philadelphia, PA, May, 2003

**Association of Firearm & Toolmark Examiners**  
*Through The Door: A Shooting Reconstruction*  
 Philadelphia, PA, May, 2003

**Association of Firearm & Toolmark Examiners**  
*The Cameron Case: Shooting Reconstruction*  
 Vancouver, BC Canada; May, 2004

**Forensic Science Educator's Conference**  
**St. Louis University School Of Medicine**  
*Crime Scene Reconstruction: What It Is & Isn't*  
 St. Louis, MO, July, 2004

**Forensic Digital Photography**  
**University Medical Center**  
**Sexual Assault Response Team**  
*Principal Instructor - 2 Day Seminar*  
 San Diego; CA, September 2004



**Publications**

*The Effect of Hair Upon the Deposition of Gunshot Residue*  
**Forensic Science Communication – Federal Bureau of Investigation**  
April, 2004

*Courtroom Computer Animation and Simulation*  
**The Champion: National Association of Criminal Defense Lawyers**  
Vol XX No. 1, Jan/Feb 1996

*The "Rhino" Bullet*  
**Wound Ballistics Review: Journal of the International Wound Ballistics Association**  
Vol 2, No. 1, 1995

*Ammunition Performance: Testing Data & Acceptance Criteria*  
**Wound Ballistics Review: Journal of the International Wound Ballistics Association**  
Vol 1, No. 4, 1993

*The Body Armor Standards Controversy*  
**Wound Ballistics Review: Journal of the International Wound Ballistics Association**  
Vol 1, No 3., 1992

*The Roots of Bad Data: The Relative Incapacitation Revisited*  
**Wound Ballistics Review: Journal of the International Wound Ballistics Association**  
Vol1, No. 2, 1992

*The Twilight Zone of Wound Ballistics*  
**Wound Ballistics Review: Journal of the International Wound Ballistics Association**  
Vol 1, No. 1, 1991

*Body Armor Standards: A Review and Analysis*  
**Wound Ballistics Review: Journal of the International Wound Ballistics Association**  
Vol 1, No. 1, 1991

*Wounding Effects of the AK-47 Rifle*  
**American Journal of Forensic Medicine and Pathology**  
(Co-author) 11(3), 185-189, 1990

*Forensic Animation*  
**The Docket**, Jan 1993

*Computer Animation Training Tapes*  
**CADalyst**, June 1993

*Evidence Set in Motion: The Mitchell Homicide*  
**Police**, June 1992

*A New Era in Combat Handguns*  
**Police Marksman**, May 1989

*The Omni-Shock Bullet*  
**Journal of the Association of Firearm & Toolmark Examiners**  
(Co-author) January, 1989



## **Alexander Jason**

### **Certified Senior Crime Scene Analyst**

*Shooting Incident Reconstruction / Forensic Photography*

PO Box 375, Pinole, CA 94564 • 510-724-1003 FAX 724-0733 / [ajason@alexanderjason.com](mailto:ajason@alexanderjason.com)

## **Fee Schedule**

### **Consulting & Analysis:**

\$200 per hour. Additional charges may be required for equipment rental and/or other professional assistance.

### **Forensic Animation:**

The fee for preparing a forensic animation is based on estimate of the work required and is quoted as a flat fee, not on an hourly basis. Advance payment of 50% is required before work is commenced.

### **Minimum Retainer:**

Minimum fee for preliminary case review is \$3,000; This is a non-refundable retainer for initial case review. Payment should accompany the documents.

### **Depositions:**

\$300 per hour; four hour minimum.

### **Testimony:**

\$2,500 per day (half-day minimum).

### **Training:**

\$2,000 per day plus all expenses.

### **Travel (beyond 50 miles):**

\$50 per hour – (half-day minimum) plus reasonable expenses which include airfare or mileage, auto rental, food, lodging, and professional support requirements which will be billed at actual cost.

### **TERMS:**

- All travel costs shall be paid in advance.
- Fees for anticipated travel time and a minimum of one day's fee shall be paid in advance prior to travel. • Fees for depositions shall be paid in advance based on the anticipated length of the examination. Balances due, if any, shall be refunded within five days after the deposition.
- Billings are monthly and are payable net 14 days from date of invoice. Unpaid balances will incur 2% per month interest charges.







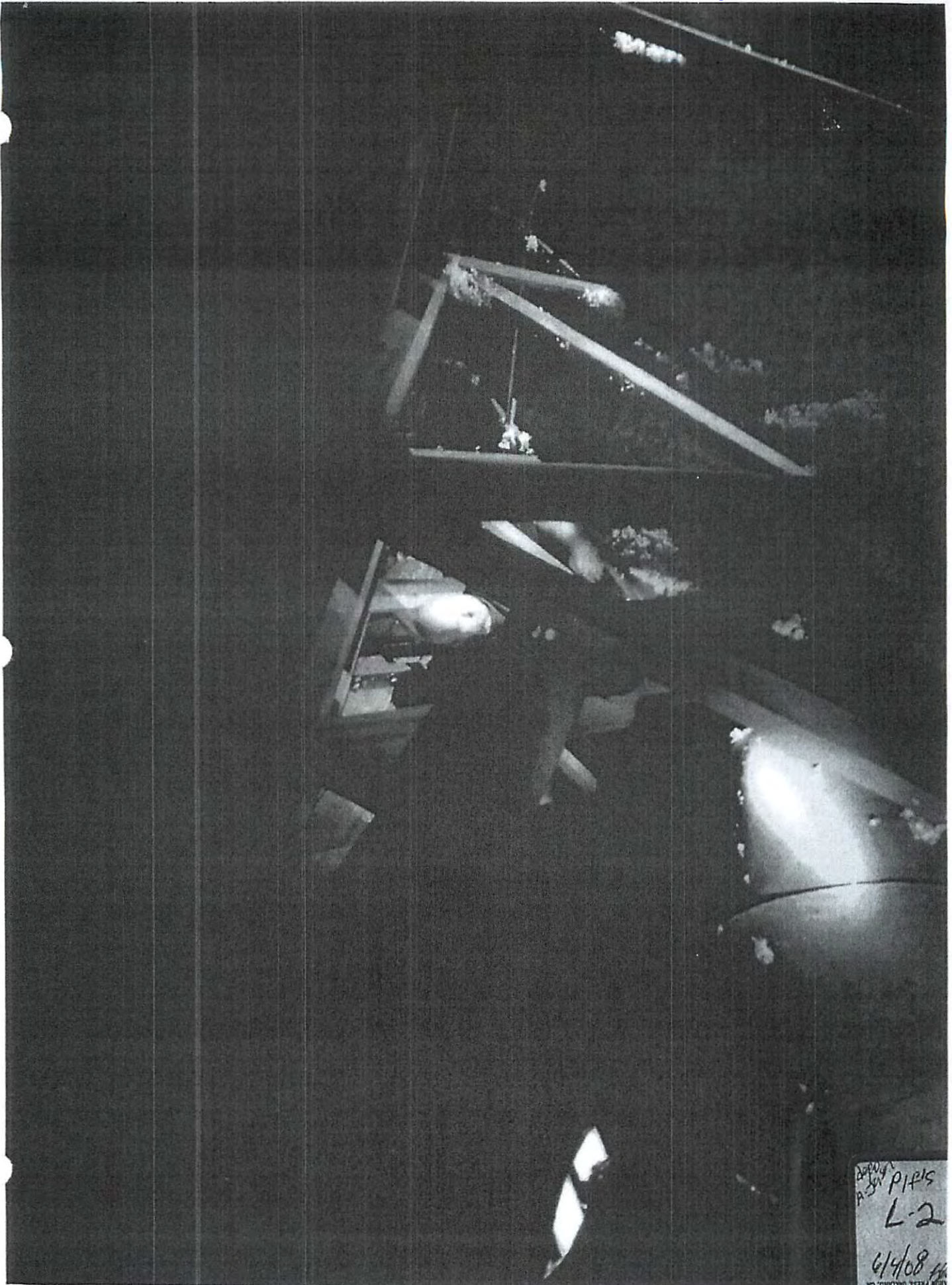
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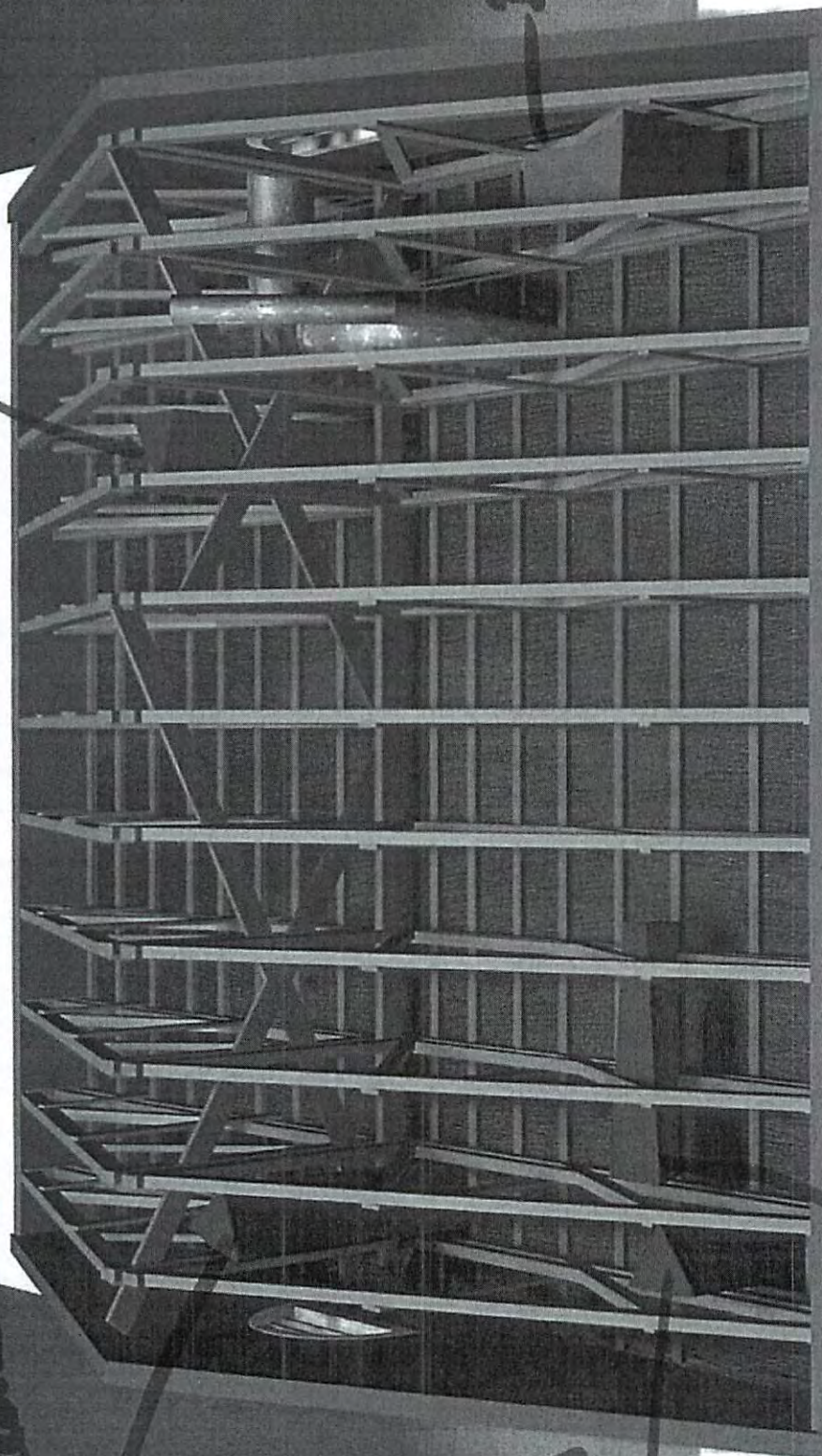


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